

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	14 Cr. 68 (KBF)
- against -	:	
ROSS ULBRICHT,	:	NOTICE OF MOTION IN SUPPORT
	:	OF DEFENDANT ROSS ULBRICHT'S
	:	MOTION PURSUANT TO RULE
Defendant.	:	38(b)(2), FED.R.CRIM.P., FOR AN
	:	ORDER RECOMMENDING
	:	CONFINEMENT AT THE "MCC" NEW
	:	<u>YORK PENDING DIRECT APPEAL</u>
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PLEASE TAKE NOTICE, that upon the annexed Declaration of Lindsay A. Lewis, Esq., and all prior papers and proceedings herein, the defendant, ROSS ULBRICHT, will move before the Honorable Katherine B. Forrest, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, at a time and date to be set by the Court, or as soon thereafter as counsel may be heard, for an Order, pursuant to Rule 38(b)(2), Fed.R.Crim.P., recommending that Mr. Ulbricht's custody be retained at the Metropolitan Correctional Center in New York City pending his direct appeal; and, for any such other and further relief as to the Court seems just and proper.

Dated: New York, New York
2 June 2015

/S/ Lindsay Lewis
LINDSAY A. LEWIS
JOSHUA L. DRATEL, P.C.
29 Broadway, Suite 1412
New York, New York 10006
(212) 732-0707

Attorneys for Defendant Ross Ulbricht

To: CLERK OF THE COURT

UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF NEW YORK

ALL DEFENSE COUNSEL